Case 1:18 cr-00799-KMW Document 197 Filed 03/06/20 Pag CHAMBERS OF KIMBA M. WOOD U.S.D.J.-S.D.N.Y.

PAUL A. GOLDBERGERT LAWRENCE A. DUBINT® EDGAR L. FANKBONNERT

## GOLDBERGER & DUBIN, P.C

ATTORNEYS AT LAW 401 BROADWAY, NEW YORK, NY 10013 (212) 431-9380 FAX (212) 966-0588 E-MAIL: GND401@AOL.COM

www.goldbergerdubin.com

USDC SDNY DATE FILED:

\*MEMBER OF NJ BAR

March 6, 2020

Hon, Kimba M. Wood Daniel Patrick Moynihan United States Courthouse 500 Pearl Street New York, New York 10007

## MEMO ENDORSED

Re:

United States v. Ziyu Wang Docket No. 18-cr-799-05 (KMW)

Dear Judge Wood:

Granted. The defense respectfully requests an expansion of time to file its sentencing submission, KMW which is due March 10, 2020. We are reviewing certain discovery material with Mr. Wang in light of a recent disclosure by the government, and Mr. Wang requires a Mandarin interpreter. For this reason, we need additional time to prepare our submission. We are not requesting a postponement of his sentencing for the moment.

It was to

Respectfully submitted,

/s/ Edgar L. Fankbonner Edgar L. Fankbonner Attorney for Ziyu Wang

Lara Pomerantz cc: U.S. Attorney's Office

Defendant's sentencing submission is due by March 16, 2020. The Government's submission is due by March 19, 2020.